INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.state.in.us/idem

December 7, 1999

Kim Conrad
Fab-Glas Industries, Inc.
300 Industrial Drive
Angola , Indiana 46703

Re: AAT 151-11350
First Administrative Amendment to
T 151-6911-00019

Dear Mrs. Conrad

Fab- Glas Industries, Inc. was issued a Title V operating permit on February 10, 1999. A letter requesting changes in the facility description and the permit conditions was received on September 17,1999. Pursuant to the provisions of 326 IAC 2-7-11 the permit is hereby administratively amended as follows (strikeout added to show what was deleted and bold added to show what was added):

(A) The facility description in condition A.2 has been changed to be as follows:

A .2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(1) Main Product Line:

(a) one (1) high volume low pressure (HVLP) gel coating booth, capable of processing 103.2 pounds of gel coat per hour, using air filters for overspray particulate matter control, exhausting through one (1) stack, identified as S1;

(b) one (1) HVLP resin lamination booth, capable of processing 457.7 pounds of resin per hour, using air filters for overspray particulate matter control, exhausting through one (1) stack, identified as S2;

(c) ~~one (1) HVLP paint spray booth, capable of processing one (1) faring per hour, using air filters for overspray particulate matter control, exhausting through one (1) stack, identified as S3;~~

(B) The facility description in Conditions D.1.1(a), D.1.4 and D.1.9 has been changed to be as follows:

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to CP 151-2367-00019, issued on May 21, 1992, the spray booths of the Main Product Line shall comply with the following conditions:

(a) Use HVLP application method for the ~~three (3)~~ **two (2)** spray booths.

(b) Use infrared lamps to enhance curing of the fiberglass for the gel coating and lamination spray booths without any add-on control for VOC emissions.

These operating conditions were determined to be the best available control technology (BACT) for the Main Product Line spray booths.

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) overspray from the ~~three (3)~~ **two (2)** spray booths in the Main Product Line and the mold gel coating and lamination area in the Mold and Pattern Department shall be limited by the following:
Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.9 Particulate Matter (PM)

Pursuant to CP 151-2367-00019, issued on May 21, 1992, the air filters for PM control shall be in operation at all times when the ~~three (3)~~ **two (2)** paint booths in the Main Product Line, and gel coating and lamination processes in the Mold and Pattern Department are in operation.

(C) The styrene monomer used in gel coating and in lamination process operation in condition D.1.11 has been changed to be as follows:

D.1.11 Record Keeping Requirements

(a) To document compliance with Conditions D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2 and/or D.1.3.

(1) The amount and styrene monomer content of resin and gel coat used, and the amount and VOC content of each coating material, and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the month of use;

(3) The cleanup solvent usage for each month;

(4) The total unreacted styrene monomer (**40.1%** of styrene monomer used in gel coating process and **38 %** of styrene monomer used in lamination process) and VOC (excluding styrene monomer) usages for each month; and

(5) The weight of VOCs emitted for each compliance period.

(D) The process description and the pressure drop range in conditions A.2 (3), D.2 , D.2.6, and D.2.5, respectively, has been changed to be as follows:

A.2 (3) Trim Department:

(1) miscellaneous **grinding/cutting of fiberglass reinforced plastics process operation equipment** (including sanders, routers, grinders and trimmers), capable of processing 531pounds of raw material per hour, controlled by a jet pulse baghouse, identified as EU-02, and exhausting through one (1) stack.

D.2 Facility Description [326 IAC 2-7-5(15)]
(4) Trim Department:
Miscellaneous ~~woodworking equipment~~ **grinding/cutting of fiberglass reinforced plastics process operation equipment** (including sanders, routers, grinders and trimmers), capable of processing 531 pounds of raw material per hour, controlled by a jet pulse baghouse with a maximum air flow rate of 13,000 actual cubic feet per minute (ACFM), identified as EU-02 and exhausting through one (1) stack.

D.2.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the ~~woodworking~~ **grinding/cutting of fiberglass reinforced plastics process operation**, at least once weekly when the ~~woodworking~~ **grinding/cutting of fiberglass reinforced plastics process operation** is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of ~~2.0 and 4.0~~ **1.0 and 6.0** inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.2.6 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the ~~woodworking~~ **grinding/cutting of fiberglass reinforced plastics process operation** when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Yogesh Parikh, at (317) 233-0203 or at (800) 451-6027, press 0 and ask for Yogesh Parikh.

Fab-Glas Industries, Inc.
Angola, Indiana
Permit Reviewer: Yogesh Parikh

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
YP

cc: File - Steuben County
U.S. EPA, Region V
Steuben County Health Department
Northern Regional Office
Air Compliance Section Inspector- Doyle Houser
Administrative and Development - Pamela Way
Air Programs Section - Michelle Boner
Compliance Data Section- Mendy Jones

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.state.in.us/idem

PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Fab-Glas Industries, Inc.
300 Industrial Drive
Angola, Indiana 46703

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T151-6911-00019	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: February 10,1999

First Administrative Amendment 151-11350-00019	Pages Affected: 6, 30, 31, 32, 33, and 34 Pages Added 34a, and 34b
Issued by: Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: December 7, 1999

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary fiberglass truck aerodynamic products manufacturing plant.

Responsible Official: Alvin R. Moll, Jr.
Source Address: 300 Industrial Drive, Angola, Indiana 46703
Mailing Address: P. O. Box 568, Angola, Indiana 46703
SIC Code: 3079
County Location: Steuben
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(1) Main Product Line:

(a) one (1) high volume low pressure (HVLP) gel coating booth, capable of processing 103.2 pounds of gel coat per hour, using air filters for overspray particulate matter control, exhausting through one (1) stack, identified as S1;

(b) one (1) HVLP resin lamination booth, capable of processing 457.7 pounds of resin per hour, using air filters for overspray particulate matter control, exhausting through one (1) stack, identified as S2;

(c) one (1) HVLP paint spray booth, capable of processing one (1) faring per hour, using air filters for overspray particulate matter control, exhausting through one (1) stack, identified as S3;

(2) Mold and Pattern Department:

(a) one (1) mold gel coating and lamination area, equipped with HVLP applicators, capable of processing one (1) mold per hour, using air filters for overspray particulate matter control, exhausting through one (1) stack, identified as S4;

(3) Trim Department:

(a) miscellaneous woodworking equipment (including sanders, routers, grinders and trimmers), capable of processing 531pounds of raw material per hour, controlled by a jet pulse baghouse, identified as EU-02, and exhausting through one (1) stack.

Facility Description [326 IAC 2-7-5(15)]
(1) Main Product Line
  (a) one (1) high volume low pressure (HVLP) gel coating booth, capable of processing 103.2 pounds of gel coat per hour, using air filters for overspray particulate matter control, exhausting through one (1) stack, identified as S1;
  (b) one (1) HVLP resin lamination booth, capable of processing 457.7 pounds of resin per hour, using air filters for overspray particulate matter control, exhausting through one (1) stack, identified as S2;
  (c) one (1) HVLP paint spray booth, capable of processing one (1) faring per hour, using air filters for overspray particulate matter control, exhausting through one (1) stack, identified as S3; and
(2) Mold and Pattern Department:
  (a) one (1) mold gel coating and lamination area, equipped with HVLP applicators, capable of processing one (1) mold per hour, using air filters for overspray particulate matter control, exhausting through one (1) stack, identified as S4.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to CP 151-2367-00019, issued on May 21, 1992, the spray booths of the Main Product Line shall comply with the following conditions:

(a) Use HVLP application method for the three (3) spray booths.

(b) Use infrared lamps to enhance curing of the fiberglass for the gel coating and lamination spray booths without any add-on control for VOC emissions.

These operating conditions were determined to be the best available control technology (BACT) for the Main Product Line spray booths.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

(a) Any change or modification to the Mold and Pattern Department that may increase VOC emissions, which include unreacted styrene monomer (with the maximum styrene weight contents of 38.0% and 40.1% for resin and gel coat, respectively) and the other VOC delivered to the applicators including the catalysts and clean-up solvents usages, to 25 tons per year shall need OAM's prior approval.

(b) The unreacted styrene monomer emissions shall be calculated by multiplying the gel coat and resin delivered to the applicators by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.

Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA approved form, emission factors shall be taken from the following reference approved by IDEM, OAM: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 28, 1998. For the purposes of these emission calculations, monomer in gel coats and resins that is not styrene shall be considered as styrene on an equivalent weight basis.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 2-2] [40 CFR 52.21]

(a) VOC emissions from the Main Product Line operation, which include unreacted styrene monomer (with the maximum styrene weight contents of 38.0% and 40.1% for resin and gel coat, respectively) and the other VOC delivered to the applicators including the catalysts and clean-up solvents usages, shall be limited to 217.4 tons per twelve (12) month period. This limitation shall also limit the source wide potential to emit VOC to less than 250 tons per year, therefore, the requirements of 326 IAC 2-2 and 40 CFR 52.21 do not apply.

(b) The emission factors used for calculating unreacted styrene monomer emissions shall be obtained from the reference approved by IDEM, OAM, as described in Condition D.1.2(b).

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) overspray from the three (3) spray booths in the Main Product Line and the mold gel coating and lamination area in the Mold and Pattern Department shall be limited by the following:
Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limits specified in Condition D.1.4 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitations contained in Conditions D.1.2 and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.8 VOC Emissions

Compliance with Condition D.1.3 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent month.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.9 Particulate Matter (PM)

Pursuant to CP 151-2367-00019, issued on May 21, 1992, the air filters for PM control shall be in operation at all times when the three (3) paint booths in the Main Product Line, and gel coating and lamination processes in the Mold and Pattern Department are in operation.

D.1.10 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S1, S2, S3) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.11 Record Keeping Requirements

(a) To document compliance with Conditions D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2 and/or D.1.3.

(1) The amount and styrene monomer content of resin and gel coat used, and the amount and VOC content of each coating material, and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the month of use;

(3) The cleanup solvent usage for each month;

(4) The total unreacted styrene monomer (35% of styrene monomer used in gel coating process and 13% of styrene monomer used in lamination process) and VOC (excluding styrene monomer) usages for each month; and

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Conditions D.1.9 and D.1.10, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]
(4) Trim Department:
Miscellaneous woodworking equipment (including sanders, routers, grinders and trimmers), capable of processing 531 pounds of raw material per hour, controlled by a jet pulse baghouse with a maximum air flow rate of 13,000 actual cubic feet per minute (ACFM), identified as EU-02 and exhausting through one (1) stack.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking facilities shall not exceed 1.69 pounds per hour when operating at a process weight rate of 531 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.3 Particulate Matter (PM)

Pursuant to CP 151-2367-00019, issued on May 21, 1992, the baghouse for PM control shall be in operation at all times when the woodworking equipment is in operation and exhausting to the outside atmosphere.

D.2.4 Visible Emissions Notations

(a) Daily visible emission notations of the baghouse stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the woodworking process, at least once weekly when the woodworking process is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 2.0 and 4.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.2.6 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.7 Broken or Failed Bag Detection

In the event that bag failure has been observed.

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.8 Record Keeping Requirements

(a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the baghouse stack exhaust.

(b) To document compliance with Condition D.2.5, the Permittee shall maintain the following:

(1) Weekly records of the Inlet and outlet differential static pressure during normal operation when venting to the atmosphere.

(2) Documentation of all response steps implemented, per event.

(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.